BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE: TARIFF FILING TO INTRODUCE LATE PAYMENT CHARGES))))	199 90T 22 DOCKET NO. 99-00574	
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MOTION FOR EXTENSION OF TIME AND CONTINUANCE AND FOR PREHEARING CONFERENCE

Comes the Consumer Advocate Division ("Consumer Advocate"), to move for an extension of time and for a prehearing conference. For cause, the Consumer Advocate Division would show:

- 1. That on or about October 15, 1999, the Executive Secretary of the Tennessee Regulatory Authority prepared a notice.
- 2. That said notice was received by the Consumer Advocate Division on October 18, 1999.
- 3. That counsel for the Consumer Advocate Division in this case has been on vacation before during and after October 18, 1999.
- 4. That counsel for the Consumer Advocate Division was not consulted regarding the dates of activities scheduled in the notice.
- 5. That the Consumer Advocate Division is prejudiced by the dates and the limits on discovery in the notice, and further that the limits on discovery are imposed in a manner inconsistent with the Tennessee Rules of Civil Procedure and without consideration of the issues involved or the positions of the parties.



- 6. That counsel for the Consumer Advocate Division is only scheduled to be in the office for part of the day on October 25, 1999 and that the Consumer Advocate Division is unfairly prejudiced by the noon deadline.
- 7. That counsel for the Consumer Advocate Division has been on vacation during the period of the notice and that the Consumer Advocate Division is unfairly prejudiced by the proposed schedule.

Wherefore the Consumer Advocate Division prays that its Motion for Extension of Time and Continuance by granted and that a prehearing conference by convened.

Respectfully Submitted,

L. Vincent Williams

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Document has been mailed postage prepaid to the parties listed below this \bigcap day of October, 1999.

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L. Vincent Williams